

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)	
PLAINTIFF,)	
)	
v.)	CASE NO. 1:16-CR-231-AT
)	
JAMES D. FRALEY, III,)	
DEFENDANT.)	
)	

**UNOPPOSED MOTION TO MODIFY SENTENCE AND
CLARIFY RESTRICTIONS**

Comes now Defendant James Fraley, by and through counsel of record, and hereby moves the Court to enter an order clarifying that he may hunt using a bow and arrow and to modify his sentence to allow him to freely travel to and from Stewart County, Georgia where he has maintained a hunting lease from over fifteen years. In support of this motion, the Defendant shows this Honorable Court the following:

1. Defendant has completed the house arrest portion of his sentence without incident.
2. Mr. Fraley has complied with all of the terms and conditions of his sentence to date.

3. Mr. Fraley has paid the entire balance of restitution, \$476,479.95, which includes \$320,479.95 to be paid jointly and severally with James Maloney, who contributed nothing.
4. Mr. Fraley has been an avid hunter all his life. He understands that he may not possess a firearm; however, the law does not prohibit him from hunting with a bow and arrow or crossbow. Probation has taken the position that he may not hunt by bow without Court permission.
5. For over fifteen years, Mr. Fraley has maintained a hunting lease in Stewart County, Georgia.
6. The undersigned has consulted with AUSA McClain and the Government does not oppose this motion.

In light of the foregoing, Mr. Fraley respectfully requests that this Court grant his Motion and permit him to travel freely to and from his hunting lease in Stewart County, Georgia and to allow him to hunt with a bow or crossbow.

Respectfully requested this 20th day of October, 2025.

Respectfully submitted,

s/Stuart M. Mones
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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that I have this day served upon all counsel of record a true and correct copy of the foregoing Motion to Consent Modify Defendant's Sentencing by electronic filing through the Court's CM/ECF system.

Dated this 20th day of October, 2025.

s/Stuart M. Mones
STUART M. MONES